

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA**

CHARLES HICKS, # 246241,)	
)	
Plaintiff,)	
vs.)	CASE NO. 2:06-CV-1033-WKW
ALABAMA DEPT. OF CORRECTIONS,)	
ET AL.,)	
)	
Defendants.)	

Motion to Expand Time to File Special Report

Comes now counsel for defendants and requests this honorable court for a twenty (20) day extension to file their Special Report to plaintiff's Petition, for and on account of the fact that further investigation of the potential witnesses is necessary to provide a full and complete report to the court, and that counsel had previously planned to be off during most of the holidays plus there is a shortage of administrative assistant staff in the office due to the holidays.

Plaintiff will not be prejudiced by the granting of requested expansion of time.

Respectfully submitted,

KIM T. THOMAS (THO115)
DEPUTY ATTORNEY GENERAL
GENERAL COUNSEL

/s/ Neal P. Conner

NEAL P. CONNER (CONN2024)
ASSISTANT GENERAL COUNSEL

ADDRESS OF COUNSEL:

Alabama Department of Corrections
Legal Division
Post Office Box 301501
301 South Ripley Street
Montgomery, AL 36130-1501
(334)353-3889

CERTIFICATE OF SERVICE

I do hereby certify that on the 28th day of December, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system,

And I hereby certify that I have mailed a copy of the forgoing via United States Mail properly addressed, postage prepaid first class to:

Inmate Charles Hicks
AIS # 246241
Frank Lee Youth Center
P.O. Box 220410
Deatsville, AL. 36016

/s/ Neal P. Conner
NEAL P. CONNER (CONN2024)
ASSISTANT GENERAL COUNSEL